

### **REMARKS**

The present amendment and remarks are in response to the Final Office Action entered in the above identified case and mailed on March 3, 2011. Claims 1-19, 21, 22, and 24-28 are pending in the application. All of the pending claims stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 7,165,226 to Thurner et al. (hereinafter “Thurner”). Applicants have amended independent claims 1, 11, 24, and 26 and canceled claims 7, and 22. With these changes Applicants respectfully submit that all of the remaining claims are now in condition for allowance.

For a claim to be anticipated under 35 U.S.C. §102 each and every element must be found in a single prior art reference. With this response Applicants have amended independent claims 1, 11, 24, and 26 to include features that are not disclosed by Thurner.. Therefore, amended claims 1, 11, 24, and 26 as well as the claims depending therefrom are not anticipated by Thurner and should be allowed.

Turning first to claim 1, claim 1 has been amended to call for an object entity stored in a computer-readable medium, the object entity comprising among other things, a third portion defining a method to be implemented to simulate on-line operation of a process plant element. This feature generally corresponds to the subject matter formerly called for in canceled claim 7. In the Final Office Action the Examiner rejected claim 7, arguing that Thurner discloses an object entity having a third portion defining a method to be implemented to simulate the on-line operation of a process plant element at col. 2, lines 55-65. Quoting Thurner, the Examiner states “Specifically, other view (not displayed) enable the visualization, design and modification of business objects and business process, runtime GUIs, electrical and mechanical construction of the plant, diagnostic, maintenance scheduling, information management, PLC-programming, batch design, recipe management, object mappings and project deployments.” This passage says nothing about an object entity that defines a method implemented to simulate the on-line operation of a process plant element. In fact, the only mention of simulation in Thurner is found in the abstract. There it says that coupled views of a GUI “represent different domains of the industrial plant or an industrial network, e.g., real-time monitoring and operation, configuration, debugging maintenance, scheduling, asset management, documentation, training, simulation, physical construction, material flow monitoring, programming, interconnecting function blocks,

performance analysis.” Thus, all that Thurner teaches with respect to simulation is that one or more GUI views may relate to simulation in an industrial plant environment. One cannot extrapolate from this mere mention of the word “simulation” the feature of “an object entity having a portion that defines a method to be implemented to simulate on-line operation of the process plant element.” Accordingly, claim 1 as presently amended is not anticipated by Thurner and should be allowed.

Claim 26 has been amended in a similar manner as claim 1 and is allowable over Thurner for the same reasons.

Claim 11 has been amended to include a conversion engine that, among other things, generates commands specifying a data conversion routine for a graphic display element for converting data values from a data source to graphically and dynamically display the data from the data source in association with the display of the graphic display element. This element generally corresponds to cancelled dependent claim 22. Although claim 22 was also rejected over Thurner, does not in fact teach the a conversion engine that generates commands specifying a data conversion routine for a graphic display element for converting data values from a data source to graphically and dynamically display the data from the data source in association with the display of the graphic display element. As the Examiner correctly notes, Thurner col. 3, lines 43-47 teach that the work bench contains a number of tools for building and modifying Data Structures and Data Flow diagrams. An object designer provides graphical design of objects in a number of different views, including Tree, Table, XML, and HTML view. Applicants cannot find anything in this passage relating to converting data from a data source in order to graphically and dynamically display the data from the data source in association with the display of the graphic display element. Because Thurner does not disclose this feature of amended claim 11, claim 11 and all of the claims depending therefrom are not anticipated by Thurner and should be allowed.

Finally, claim 24 has been amended to call for a method of configuring a user interface system for a process plant that includes, among other things, modifying an object defining a composite graphical element, propagating the modification to each of a plurality of instances of the composite graphical element, and automatically updating each of the plurality of instances of the composite graphical element to reflect the modification. Thurner does not teach using an object defining a composite graphical element to create a plurality of

instances of the composite graphical element. Further, Thurner does not teach modifying the object that defines the composite graphical element, nor does Thurner teach propagating the modification to each of a plurality of instances of the composite graphical element, and automatically updating each of the plurality of instances of the composite graphical element to reflect the modification. Because Thurner does not disclose these features of claim 24, claim 24 and claim 25 which depends therefrom are not anticipated by Thurner and should be allowed.

### **CONCLUSION**

For the foregoing reasons Applicants submit that all of the remaining claims are now in condition for allowance. The Commissioner is hereby given authorization to charge any fees or credit any overpayments to Deposit Account No. 13-2855 of Marshall, Gerstein & Borun, LLP under Order No. 06005/41127.

Should the examiner wish to discuss any of the foregoing comments or any claim amendments deemed necessary to gain allowance, applicants kindly request that the Examiner contact Applicant's attorney by telephone at the number provided below.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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